

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JAMES HARKER,

Plaintiff,

v.

META PLATFORMS, INC., ASSOCIATION  
OF INDEPENDENT COMMERCIAL  
PRODUCERS, INC., SOMETHING IDEAL,  
LLC, doing business as “M SS NG P ECES,”  
and BBDO WORLDWIDE, INC.

Defendants.

Case No. 1:23-CV-07865-LTS

**NOTICE OF DEFENDANT  
SOMETHING IDEAL, LLC, D/B/A  
M SS NG P ECES’ MOTION TO  
DISMISS PLAINTIFF’S FIRST  
AMENDED COMPLAINT  
PURSUANT TO FEDERAL RULES OF  
CIVIL PROCEDURE 12(b)(1) and  
12(b)(6)**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and the Original Complaint and Amended Complaint filed by Plaintiff in the above-captioned action (Dkt. Nos. 1, 34), Defendant Something Ideal, LLC d/b/a “M ss ng P eces” (“Something Ideal”), through its attorneys Venable LLP, will move this Court, before the Honorable Laura T. Swain, United States District Judge, on a date and time to be set by the Court, at the Southern District of New York, 500 Pearl Street, Courtroom 17C, for an Order dismissing the First Amended Complaint against Something Ideal pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and for such other further relief as the Court deems just and proper.

Dated: December 19, 2023  
New York, New York

VENABLE LLP

/s/ Nicholas M. Reiter  
Jessie F. Beeber  
Nicholas M. Reiter  
151 W 42<sup>nd</sup> Street, 49<sup>th</sup> Floor  
New York, New York 10036  
(212) 370-6296  
jfbeeber@venable.com  
nmreiter@venable.com

*Attorneys for Defendant Something Ideal,  
LLC d/b/a “Missing Pieces”*